

CITY OF CHICAGO DEPARTMENT OF
LAW, AFFIRMATIVE LITIGATION
DIVISION

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, AFL-CIO, *et*
al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, *et al.*,

Defendants.

Case No. 3:25-cv-03698

**DECLARATION OF MIGUEL
CAMPOS IN SUPPORT OF
PLAINTIFFS' MOTION FOR
TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

DECLARATION OF MIGUEL CAMPOS

I, MIGUEL CAMPOS, declare:

1. I am a resident of the City of Chicago in the State of Illinois. I am over the age of 18 and have personal knowledge of all the facts stated herein, except to those matters stated upon information and belief; as to those matters, I believe them to be true. If called as a witness, I could and would testify competently to the matters set forth below.

2. I currently serve as the Director of the City of Chicago's Office of Labor Standards, which is housed within Chicago's Department of Business Affairs and Consumer Protection. The Office of Labor Standards enforces Chicago's wage, sick leave, and other labor laws. Among other work, the Office of Labor Standards processes workers' complaints, conducts investigations, mediates disputes, directs settlement proceedings, issues violations and seeks licensure discipline against employers.

3. Collaboration with State and Federal partners is an essential element of the Office of Labor Standards' work. In September 2022, Chicago's Department of Business Affairs and Consumer Protection entered a five-year Memorandum of Understanding with the United States Department of Labor's Wage and Hour Division. That Memorandum of Understanding explains that Chicago and the Department of Labor share a "common interest" in "sharing training materials, conducting joint investigations, and sharing information." To that end, the Memorandum of Understanding "outlines procedures to be followed by both [the Department of Labor and Chicago] in working together to address the need for enforcing Wage and Hour Laws."

4. The Memorandum of Understanding identifies multiple ways in which the Department of Labor and Chicago agreed to work together.

5. First, the Memorandum of Understanding describes ways in which the Department of Labor and Chicago may jointly conduct outreach and education efforts:

- a. "The agencies agree to coordinate, conduct joint outreach presentations, and prepare and distribute publications, when appropriate, for the regulated community of common concern."
- b. "The agencies agree to work with each other to provide a side-by-side comparison

1 of laws with overlapping provisions and jurisdiction.”

2 c. “The agencies agree to jointly disseminate outreach materials to the regulated
3 community, when appropriate.”

4 6. Second, the Memorandum of Understanding describes ways in which the Department
5 of Labor and Chicago may jointly enforce labor laws:

6 a. “The agencies may conduct joint investigations in the City of Chicago if
7 appropriate or if opportunity provides.”

8 b. “The agencies may coordinate their respective enforcement activities and assist
9 each other with enforcement, where appropriate and to the extent allowable under
10 law.”

11 c. “The agencies will make referrals of potential violations of each other’s statutes,
12 where appropriate.”

13 7. Third, the Memorandum of Understanding describes ways in which the Department
14 of Labor and Chicago may exchange information:

15 a. “The agencies agree to exchange information on laws and regulations of common
16 concern to the agencies, to the extent practicable.”

17 b. “The agencies will establish a methodology for exchanging investigative leads,
18 complaints, and referrals of possible violations, to the extent allowable by law or
19 policy.”

20 c. “The agencies will exchange information (statistical data) on incidence of
21 violations in specific industries and geographic areas, if possible.”

22 8. Fourth, the Memorandum of Understanding identifies joint training initiatives:

23 a. “The agencies agree to cross train investigators and other staff no less than once
24 per calendar year, subject to agency resources and any applicable legal
25 requirements. Joint training will be conducted to educate staff members of both
26 agencies about the laws and regulations enforced by both, and to discuss issues of
27 common concern.”

28 b. “The agencies will exchange information related to policy or regulatory changes

1 to State or Federal laws, to the extent permissible.”

2 9. The Department of Labor and the Office of Labor Standards have since implemented
3 the Memorandum of Understanding by working together on multiple matters.

4 10. For example, the Department of Labor provides the Office of Labor Standards with
5 online video and written training materials about conducting labor-related investigations. The
6 training material is part of a training platform developed by the Department of Labor called the
7 Government Agency Training Academy. The Department of Labor also provides the Office of Labor
8 Standards with in-person training, most recently at an all-day symposium held on March 6, 2025.
9 The City could not adequately replace this training if the Department of Labor ceases providing it
10 due to staffing reductions.

11 11. To take another example, the Department of Labor and the Office of Labor Standards
12 have quarterly meetings to share information and updates on Chicago-area labor issues. The
13 Department of Labor and the Office of Labor Standards have established an investigation referral
14 system, under which time-sensitive investigations are referred immediately while standard
15 investigations are shared once a month. The Department of Labor and the Office of Labor Standards
16 both have active open investigations that were referred by one another. This investigative referral
17 system is a key component of the Office of Labor Standards’ work.

18 I declare under penalty of perjury under the laws of the United States of America that the
19 foregoing is true and correct.

20 Executed on April 29, 2025, in Chicago, Illinois.

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23 Miguel Campos
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